



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**MAR 14 2017**

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7011 1150 0000 2640 3362**  
**RETURN RECEIPT REQUESTED**

Kevin M. Kennedy, President  
TK Holdings Inc.  
2500 Takata Drive  
Auburn Hills, Michigan 48326

Re: Request for Information  
EPA RCRA ID No.: MID985569748, 69700 Powell Road, Armada, Michigan 48005;  
Non-notifier, 1199 Austin Court, Howell, Michigan 48843;  
Non-notifier, 111 Payerk Court, Romeo, Michigan 48065;  
EPA RCRA ID No.: MOP000001169, 1801 Roosevelt Avenue, Joplin, Missouri 64801

Dear Mr. Kennedy:

By this letter, the U.S. Environmental Protection Agency (EPA) requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires TK Holdings Inc. (the facility or you) to submit certain information relating to recalled airbag inflators at facilities located at 69700 Powell Road in Armada, Michigan, 1199 Austin Court in Howell, Michigan, 111 Payerk Court in Romeo, Michigan, and 1801 Roosevelt Avenue, Joplin, Missouri. We are requiring this information to determine each facility's compliance status with the Identification and Listing of Hazardous Waste regulations set forth at Part 2, R 299.9201 et seq., Mich. Admin. Code [40 Part 261]. The enclosure specifies the information you must submit. You must submit this information within thirty (30) calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Sue Rodenbeck Brauer, 77 West Jackson Boulevard, LR-17J, Chicago, Illinois 60604.

TK Holdings Inc. must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us immediately. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.



## Procedure for Confidential Business Information Claims

You may, under 40 C.F.R. Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

In accordance with the regulations set forth at 40 Part 2, EPA will afford TK Holdings Inc. with an opportunity to substantiate its claim of CBI protection before a final determination is made as to whether the documents at issue qualify for such protection. The purpose of this paragraph is to notify you that U.S. EPA's Office of Regional Counsel will be making a final confidentiality determination concerning the information provided and to afford you with the opportunity to substantiate your claim of CBI protection. If TK Holdings Inc. continues to believe that some or all of the information requested in the attachment is entitled to confidential treatment, you must identify the specific portions of the information you consider confidential.

You must substantiate and justify the CBI claim independently for *each and every sentence or line item* contained in the attachments to the response. Generic justifications referring to the entire response will not be sufficient, and may result in a denial of your request for CBI protection over all information contained in the response and attachments.

For each item of information which TK Holdings Inc. ultimately identifies as being subject to your claim, please provide responses to the following:

1. The specific portions of the information which you consider to be entitled to confidential treatment;
2. The period of time for which confidential treatment is desired (e.g., until a certain date or until the occurrence of a certain event, etc.);
3. The purpose for which the information was provided to U.S. EPA, and the approximate date of submission, if known;
4. Whether a business confidentiality claim accompanied the information when it was *first* received by U.S. EPA;
5. Measures which you and/or TK Holdings Inc. have taken to guard against undesired disclosure of the information to others;
6. The extent to which the information has been disclosed to others and the precautions taken in connection therewith;



7. Whether there are pertinent confidentiality determinations by U.S. EPA or other federal agencies. If so, enclose a copy of any such determinations;
8. Whether you assert that disclosure of the information would be likely to result in substantial harmful effects to your competitive position. If so, explain the nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects (generally including the manner in which a competitor could use the information);
9. Whether you assert that the information is "voluntarily submitted" as defined at 40 C.F.R. § 2.201(i). If so, explain how disclosure would tend to lessen U.S. EPA's ability to obtain similar information in the future. Pursuant to 40 C.F.R. § 2.305, "Special rules governing certain information obtained under the Solid Waste Disposal Act, as amended," no information to which this section applies is voluntarily submitted information.
10. Any other issue which you deem relevant.

See 40 C.F.R. § 2.204(e)(4). Please note that you bear the burden of substantiating your confidentiality claim pursuant to 40 C.F.R. § 2.208(e). Conclusory allegations will be given little or no weight in the determination. You must explain why each and every item of information subject to your CBI claim is entitled to protection. If relevant facts necessary for the substantiation are themselves confidential, please identify them as such, in order that EPA may preserve confidentiality with respect to these facts pursuant to 40 C.F.R. § 2.205(c). In the absence of such identification, your comments will be available to the public without further notice.

If TK Holdings Inc. wishes to designate all or part of the information as CBI, TK Holdings Inc. should clearly mark an attached cover sheet and each page that contains CBI with the term "Confidential," "Trade Secret," "Proprietary," or other appropriate term indicating the confidential nature of the information contained on that page. Confidential portions of any particular page should be clearly marked by highlighting, bracketing, or some other marking that clearly identifies the precise information that is claimed as CBI. In addition to the marked copy, a second copy of the submission, from which all the marked information and legends are removed, should accompany the submission leaving only the non-confidential portions of the submission. This second copy will be placed in public files and will not be handled as CBI.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject TK Holdings Inc. to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.



You should direct questions about this request for information to Ms. Sue Rodenbeck Brauer, at (312) 353-6134.

Sincerely,



Julie Morris  
Chief  
Compliance Section 2

Enclosure

cc: LeeL@Michigan.Gov (w/ enclosure)  
DayJ@michigan.gov (w/ enclosure)  
GrochowskiB@Michigan.gov (w/ enclosure)

Steven G. Bradbury  
Dechert LLP  
1900 K Street, NW  
Washington, District of Columbia 20006-1110





## REQUEST FOR INFORMATION

**Instructions:** You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

### Requests

- 1) Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name, title, and address (including e-mail address and phone number) for each person identified.

Quantification and identification of hazardous materials stored at TK Holdings Inc.  
Howell, Michigan warehouse

- 2) TK Holdings Inc., through the United States Department of Transportation's National Highway Traffic Safety Administration and Attorney Steven G. Bradbury at Dechert, provided responses to questions from the EPA, "TK Holding Inc.'s Responses to Questions Raised by the Environmental Protection Agency" about June 23, 2016. Subsequently, the EPA learned that recalled inflator types exist in addition to PSDI, SDI, SPI, PSPI, PSPI-L, PSPI-2, PSPI-6 and PSDI-5.<sup>1</sup> Additional inflator types include but are not limited to PSDI-4 and PSDI-4K. During the June 23, 2016, inspection of the Armada facility, TK Holdings Inc. represented that there are 169 stock keeping units for inflators.

- a) How many stock keeping units are there for inflators subject to the NHTSA Preservation Order? List the stock keeping units or other unique inflator identifiers.

Identify all airbag inflator types stored in the Howell, Michigan warehouse as of June 23, 2016. Use terms including but not limited to, "deployed," "used," "untested," "unused," "PSAN," "non-PSAN," "desiccated," and "non-desiccated" as well as PSDI varieties, SPISDI varieties, SPI varieties, and PSPI varieties to identify inflator types.

- b) Provide the maximum weight (in grams) of each gas generating chemical corresponding to an inflator stock keeping unit subject to the NHTSA Preservation Order and stored at the Howell, Michigan warehouse.
  - i) Use International Union of Pure and Applied Chemists (IUPAC) nomenclature to state the chemical composition of gas generating chemicals.
  - ii) Provide the chemical name(s) commonly used by industry.
- c) Provide an inventory count of each inflator stock keeping unit subject to the NHTSA

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<sup>1</sup> PSDI means programmable smokeless driver inflator. PSPI means programmable smokeless passenger inflator.

preservation order on-site at the Howell, Michigan warehouse as of November 20, 2016.<sup>2</sup>

- d) Provide an inventory count of each "airbag inflator," "airbag module," "pyromechanical safety device," "seat belt pre-tensioner," or "safety devices, electrically ignited," not subject to the NHTSA preservation order on-site at the Howell, Michigan warehouse as of November 20, 2016, consistent with the directions in 2 a) through 2 c) above. This request includes gas generators recalled from outside the United States and explosive materials that may contribute to the potential for harm to human health or the environment by fire, explosion, or harmful gas.
- e) For each inflator counted in response to request 2 c) above, identify the associated "priority group" as that term is used in the United States Department of Transportation, NHTSA Third Amendment to the Coordinated Remedy Order, *In re*: Docket No. NHTSA-2015-0055, Coordinated Remedy Program Proceeding, Amended Annex A, dated December 9, 2016.

Quantification and identification of hazardous materials stored at TK Holdings Inc. in Romeo, Michigan

- 3) Provide an inventory count of each inflator subject to the NHTSA preservation order on-site at the Romeo, Michigan warehouse as of November 20, 2016, as specified below:
  - a) Provide an inventory count of each inflator stock keeping unit subject to the NHTSA preservation order on-site at the Romeo, Michigan warehouse as of November 20, 2016.
  - b) Provide an inventory count of each "airbag inflator," "airbag module," "pyromechanical safety device," "seat belt pre-tensioner," or "safety devices, electrically ignited," not subject to the NHTSA preservation order on-site at the Romeo, Michigan warehouse as of November 20, 2016, consistent with the directions in 2 a) through 2 c) above. This request includes gas generators recalled from outside the United States and explosive materials that may contribute to the potential for harm to human health or the environment by fire, explosion, or harmful gas.
  - c) For each inflator counted in response to request 3a) above, identify the associated "priority group" as that term is used in the United States Department of Transportation, NHTSA Third Amendment to the Coordinated Remedy Order, *In re*: Docket No. NHTSA-2015-0055, Coordinated Remedy Program Proceeding, Amended Annex A, dated December 9, 2016.

Quantification and identification of hazardous materials stored at TK Holdings Inc. in Armada,

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<sup>2</sup> This information request assumes that TK Holding Inc.'s maximum warehouse inventory at Howell, Michigan was immediately prior to the first shipment of inflators off-site to Joplin, Missouri for disposal and that this maximum inventory occurred on or about on November 20, 2016. If this is not correct, please contact the U.S. EPA.

## Michigan

- 4) Provide an inventory count of propellant removed from each inflator subject to the NHTSA preservation order and stored on-site at the Armada, Michigan facility as of November 20, 2016, as provided below:
  - a) Provide an inventory count of propellant from each inflator stock keeping unit subject to the NHTSA preservation order on-site at the Armada, Michigan facility as of November 20, 2016.
  - b) Provide an inventory count of each "airbag inflator," "airbag module," "pyromechanical safety device," "seat belt pre-tensioner," or "safety devices, electrically ignited," not subject to the NHTSA preservation order on-site at the Armada, Michigan facility as of November 20, 2016, consistent with the directions in 2 a) through 2 c) above. This request includes gas generators recalled from outside the United States and explosive materials that may contribute to the potential for harm to human health or the environment by fire, explosion, or harmful gas.
  - c) For propellant from each inflator stock keeping unit counted in response to request 4 a) above, identify the associated "priority group" as that term is used in the United States Department of Transportation, NHTSA Third Amendment to the Coordinated Remedy Order, In re: Docket No. NHTSA-2015-0055, Coordinated Remedy Program Proceeding, Amended Annex A, dated December 9, 2016.
- 5) If recalled inflator propellant is stored somewhere other than Building H at Armada, provide the total quantity by chemical composition for each building location at the Armada, Michigan facility.

## Quantification and identification of hazardous materials stored at TK Holdings Inc. elsewhere in the United States

- 6) Identify all United States locations that are used to store inflators subject to the NHTSA preservation order on-site by completing an EPA Form 8700-12 Notification of Regulated Waste Activity<sup>3</sup> and submitting a copy of each form in response to this request.

By way of explanation, U.S. EPA anticipates that each location will be a generator of hazardous waste when hazardous materials are transported offsite for disposal.

- 7) Provide an inventory count of each inflator subject to the NHTSA preservation order on-site at each location identified in 6) above as of November 20, 2016, as specified above in 2 c) through 2 e).

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<sup>3</sup> EPA Form 8700-12 was available online at <https://www.epa.gov/hwgenerators/how-hazardous-waste-generators-transporters-and-treatment-storage-and-disposal> as of March 10, 2017.

Testing of Used Inflators subject to NHTSA Preservation Order

- 8) According to TK Holdings, Inc. representatives on June 23, 2016, Test Series 6 (specifically, test 6 c) from “Part I: Classification Procedures, Test Methods, and Criteria Relating to Explosives of Class 1” in The United Nations’ *Recommendations on the Transport of Dangerous Goods: Manual of Tests and Criteria, Sixth Revised Edition* (New York and Geneva, copyrighted, e.g., 2015) was used to exclude air bag inflators from regulation as a Class 1.4 explosive material for purposes of transportation and U.S. Department of Transportation regulation. (See the December 29, 1994 Federal Register preamble accompanying addition of UN3268 to the table found at 49 C.F.R. § 172.101.)
- a) Did TK Holdings Inc. or Takata submit to DOT’s Pipeline and Hazardous Materials Safety Administration (PHMSA) data from testing conducted pursuant to “Part I: Classification Procedures, Test Methods, and Criteria Relating to Explosives of Class 1” for *all* inflators identified in the response to 2 c) (above) subject to the NHTSA Preservation Order?
  - b) Provide the “Classification of Explosives” document issued by PHMSA for each inflator identified in the response to 2 c) above and the part of your corresponding application(s) or supporting material(s) that identifies the chemical composition of gas generant.
  - c) For each inflator identified in response to 2 a) above, state how many of each stock keeping unit ruptured during Inflator Ballistic Testing<sup>4</sup> before reaching the manufacturing specification and how many were tested by November 20, 2016.
  - d) For each inflator identified in response to 2 a) above, state how many of each stock keeping unit ruptured during hydroburst testing before reaching the manufacturing specification and how many were tested by November 20, 2016.
  - e) For each inflator identified in response to 2 a) above, state how many of each stock keeping unit ruptured during environmental conditioning (thermal cycling) and how many were tested by November 20, 2016.
  - f) For each inflator identified in response to 2 a) above, state how many of each stock keeping unit were out of manufacturing specifications as determined by CT scan and how many were tested by November 20, 2016.
  - g) For each inflator identified in response to 2 a) above, state how many of each stock keeping unit were subjected to bonfire testing (UN Transport of Dangerous Goods test 6 c) by November 20, 2016.

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<sup>4</sup> Inflator Ballistic testing was called “high pressure burn rate test” in EPA’s June 2016 RCRA inspection report for the Armada facility.

Solid waste and hazardous waste determinations pursuant to RCRA

- 9) How many of the recalled or returned inflators managed at the Howell, Michigan warehouse have been tested? Provide your response in percentage terms for each inflator identified by 2 c) above.
- 10) How many of the recalled or returned inflators managed at the Howell, Michigan warehouse can no longer serve the purpose for which the inflators were produced (i.e., will never be used again in a supplemental restraint system, the original intended purpose)? Provide your response in percentage terms for each inflator identified by 2 c) above.
- 11) Has TK Holdings, Inc. performed RCRA solid and hazardous waste determinations on the tested inflators that are stored in 55-gallon steel drums at the Howell, Michigan warehouse? See 40 C.F.R. § 262.11. Explain how you determined that the inflators are or are not solid waste and are or are not hazardous waste as those terms are defined by the Resource Conservation and Recovery Act, as amended. Your response shall address, in particular, why does DOT require gas venting of the drums (e.g., taped bungs or vents) if the tested inflators have been deployed and no longer contain ignitable hazardous waste as defined at 40 C.F.R. § 261.21 (e.g., no longer contain strong oxidizers) or are no longer reactive as defined at 40 C.F.R. § 261.23? (In other words, is all the propellant deactivated in the testing event, and do the tested inflators meet Land Disposal Restrictions Universal Treatment Standards found at 40 C.F.R. § 268.48?)
- 12) If TK Holdings, Inc. has performed hazardous waste determinations on the inflators described in 2 a), provide the sampling information (e.g., chain of custody) and analytical test results (including QA/QC) or the regulation and information upon which TK Holdings relies to determine that the tested inflators stored in steel drums at the Howell, Michigan warehouse are or are not hazardous waste. See 40 CFR Part 261, Subparts A and B.
- 13) Has TK Holdings, Inc. performed RCRA hazardous waste determinations on the ammonium nitrate-containing or other inflators received in the United States from foreign nations including, but not limited to, Japan?

(See 40 C.F.R. § 262.11, paragraphs 3 and 4 of the Preservation Order and Testing Control Plan (PE 14-016), and paragraphs 19 and 20 of the May 16, 2016, NHTSA Recall Order. A pallet of inflators from Japan was distinguished by red shrink-wrap at the time of the June 2016 RCRA inspection of the Howell, Michigan warehouse.)

Resubmission of UTEC Corporation's Laboratory Report No. 16126A, dated September 28, 2016 and claimed RCRA Confidential Business Information in an October 9, 2016 letter to Ms. LaShan Haynes of EPA, is not required.

- 14) If TK Holdings Inc. has performed hazardous waste determinations on the inflators

described in 3. (Romeo, Michigan warehouse), provide the sampling information (e.g., inflator type, chain of custody) analytical test results (including QA/QC) or the regulation and information upon which TK Holdings Inc. relies to determine that the tested inflators are or are not hazardous waste. See 40 CFR Part 261, Subparts A and B.

- 15) In June 2016, "TK Holding Inc.'s Responses to Questions Raised by the Environmental Protection Agency" (submitted through NHTSA to EPA) listed PSDI, SDI, SPI, PSPI, PSPI-L, PSPI-2, PSPI-6, and PSDI-5 as "specified inflators" in response to Question 1(a). NHTSA's May 16, 2016, Recall Order expanded the recall to all non-desiccated frontal airbag inflators.
- 16) Of the airbag inflator types identified in responses to 2 and 15 above, how many of each type were, are, or will be subject to the NHTSA preservation order?
- 17) In June 2016, "TK Holding Inc.'s Responses to Questions Raised by the Environmental Protection Agency" (submitted through NHTSA to EPA) listed PSDI, SDI, SPI, PSPI, PSPI-L, PSPI-2, PSPI-6, and PSDI-5 as "specified inflators" in response to Question 1(a). Takata provided incomplete chemical composition by weight of the propellant in Takata's PSAN-based inflators. Takata provided a maximum (grams and pounds) of ammonium nitrate and percent composition of ammonium nitrate by weight of 2004 Gas Generant. However, Takata did not provide a maximum weight of 3110 (booster propellant) Gas Generant or AI-1 (igniter) Gas Generant (or any other gas generant used) along with the maximum weight of a gas generant component (e.g., strontium nitrate for 3110 Gas Generant or potassium chlorate for AI-1 Gas Generant). Provide the maximum weight of each gas generant component and the maximum (by weight) of an oxidizer in each component for the "specified inflators" above plus PSDI-4, PSDI-4K, and in addition any other inflator type received and stored at the Howell, Michigan warehouse. Alternatively, Takata may provide the maximum weight of each chemical ingredient in each gas generant for each inflator type.

It is not necessary to repeat information provided in response to 2 above.

- 18) Does TK Holdings, Inc. plan to "recycle," as that term is defined at 40 C.F.R. §§ 261.1(c)(4, 5, and 7), the gas generant chemicals in recalled or returned inflators?
- 19) How many of the inflators and other pyrotechnic devices stored at the Howell, Michigan and Joplin, Missouri warehouses does Takata plan to "use or re-use" (as that term is defined at 40 C.F.R. § 261.1(c)) for the original intended purpose?

Howell, Michigan Warehouse Suitability Review, Draft Report (BakerRisk Project No. 01-05199-001-15 dated March 20, 2015)

- 20) Did you/TK Holdings Inc./Takata provide to BakerRisk:
  - a) your application to DOT that resulted in reclassification of the airbag inflators from

DOT Class 1.4 Explosive materials to Class 9 Miscellaneous Hazardous Material?

- b) the identity of the materials to be stored as recalled or returned airbag inflators subject to the NHTSA Preservation Order?
- 21) Did you/TK Holdings Inc./Takata direct BakerRisk to consider only the hazards posed by the DOT 4 G boxes and packaging supplies?
- 22) Provide a copy of any hazard analyses for use of the Howell, Michigan, warehouse, such as suitability of the aisle-spacing observed by EPA in June 2016 (less than the recommended 8 feet) and quantity of material stored (over 13 million inflators in November 2016 as opposed to the storage of 7 million inflators evaluated by BakerRisk).
- 23) If a defective inflator packaged for storage in the warehouse deployed and ruptured, what effect would it have on other inflators in the box and on other inflators on the pallet?
- 24) How is the sprinkler system activated (manual pulls, sensors, heat risers)? If sensors, where are they located in the warehouse?
- 25) What is the maximum storage height of the boxed inflators?
- 26) What is the warehouse ceiling height?
- 27) Are the warehouse storage racks open or solid?
- 28) Was an analysis done to show the Early Suppression Fast Response system will provide proper coverage given the less-than-eight feet aisle spacing and small vertical space between shelved pallets of boxes?
- 29) Is there any requirement to test or inspect the fire suppression system pumps periodically?
- 30) When were the three fire suppression water pumps last tested?
- 31) How is the warehouse building protected from a lightning strike?
- 32) Is the electrical system isolated from combustible material in case there is a lightning strike?
- 33) Has any hazard analysis been done on the facility to determine degree of potential hazards and proposed recommendations? If yes, provide the analysis.
- 34) EPA obtained copies of six DOT letters that define the required packaging configurations for different model inflators. When repackaged for shipment off-site (e.g., to Missouri), are the inflators separated and packed with like devices per the DOT requirements?

Specifically, are the inflators re-equipped with wires connected to the initiator?

- 35) How many inflators are contained on a pallet? Has a UN test 6 c) (bonfire test) been performed on this physical configuration to evaluate the premise that DOT transportation standards for newly manufactured product apply to recalled inflators stored in a warehouse?
- 36) Given the storage configuration EPA inspectors observed in June 2016, if a fire started with material on the bottom pallet, would you expect the sprinkler system to extinguish the fire before the propellant reached the cook-off temperature for the priority group 1 recalled and returned inflators? Explain your response.

#### Financial Assurance for Closure

- 37) In order to prevent cost recovery litigation under Superfund, RCRA requires owners/operators of hazardous waste storage facilities to obtain financial assurance for closure costs when storing hazardous waste generated off-site. The RCRA Online document interpreting storage of material as legal evidence (that would otherwise be regulated hazardous waste) pursuant to 40 C.F.R. § 261.4(d) contemplates storage by State or Federal authorities. State and Federal facilities are excluded from the financial assurance for closure requirement while privately owned facilities typically are not. To the extent that you have obtained financial assurance for closure as required by Michigan Administrative Code § R299.9701 et seq., provide a copy of the financial assurance document for each facility.
- 38) It is apparent that a warehouse or warehouses may be needed to manage recalled or returned inflators for years into the future. What capacity storage do you foresee needing and over what period of time, considering recalled inflator receipts, treatment/disposal capacity, and quantity of inflators recalled?

#### Texas Truck Incident

- 39) Regarding the Texas truck accident, did the assembled inflators deploy? If yes, what is the intended deployment mechanism?
- 40) Regarding the Texas truck accident, what quantity of each propellant type was in transit and how was it packaged/assembled?
- 41) Provide a copy of any and all accident reports for the Texas truck incident you have obtained from insurance investigators or brokers, State or Federal departments and agencies.



Certification

42) Provide the following certification by a responsible corporate officer:

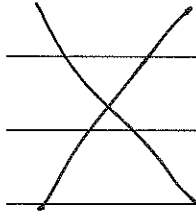
I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



# LAND AND CHEMICALS DIVISION

Type of Document: RCRA Subtitle C Information Request

Name of Document: T K Holdings Inc., MID985569748, Armada, MI  
T K Holdings Inc. non-notifier, Howell, Michigan  
T K Holdings Inc. non-notifier, Romeo, Michigan  
T K Holdings Inc. MOP000001169, Joplin, Missouri

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	Sue Brauer <i>SRB</i>	<u>3/13/2017</u>
APA:	Gaye Cuerington <i>attached</i>	
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BRANCH CHIEF:		
DIVISION APA:		
DIVISION DIRECTOR:		
OTHERS:	Jeff Cahn, ORC <i>attached</i>	
DRA:		
RA:		

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RETURN TO: Sue

PHONE: 3-6134

COMMENTS: Jeff provided comments on 3/13/2017. &  
accepted all his changes. Gaye's comment is attached.  
Jeff's email is attached.

